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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS,  
DALLAS DIVISION**

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Hiram Patterson, et al.,  
*Plaintiffs,*

v.

Mike Rawlings, et al.,  
*Defendants.*

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Civil Action No. 3:17-CV-02361-D

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**PLAINTIFFS' REPLY TO DEFENDANTS' RESPONSE TO PLAINTIFFS'  
MOTION FOR SANCTIONS**

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Plaintiffs reply to defendants' response to plaintiffs' motion for sanction to clarify the record, to correct factual errors, and to ask the Court to impose sanctions against defendants.

**A. INTRODUCTION**

1. Plaintiffs are HIRAM PATTERSON and the TEXAS DIVISION, SONS of CONFEDERATE VETERANS, INC.

2. Defendants are MIKE RAWLINGS, in his official capacity as MAYOR of the CITY OF DALLAS, and SCOTT GRIGGS, ADAM MEDRANO, CASEY THOMAS, DWAIN CARAWAY, RICKY CALLAHAN, OMAR NARVAEZ, KEVEN FELDER, TENNELL ATKINS, MARK CLAYTON, ADAM McGOUGH, LEE KLEINMAN, SANDY GREYSON, JENNIFER

GATES, and PHILIP KINGSTON, in their official capacities as DALLAS CITY COUNCIL MEMBERS.

3. Plaintiffs have sued defendants for denial of plaintiffs' right to free speech under the First Amendment, as applied to the states under the Fourteenth Amendment.

### **B. ARGUMENT**

4. Plaintiffs believe that regardless of the style of defendants' pleadings and motions, their substance warrants sanctions under Rule 12(f) for being redundant and immaterial. F. R. Civ. P. Immateriality arises from defendants' repeated and repetitious redundancy of the same defenses in multiple filings.

5. Plaintiffs erred in listing City attorneys' support staff as attorneys in this matter. (ECF No. 37-1 at 11-12). City attorneys cite Leah Tuccelli, Lisa Penney, and Yvonne Walker as being secretaries and paralegals. (ECF No. 41 at 4). Plaintiffs erred in listing support staff as attorneys and made a good-faith effort to faithfully list the City attorneys by simply using the list that defendants themselves had posted on the electronic case filing for people receiving service in this matter.

### **D. CONCLUSION**

6. Plaintiffs erred in including City attorneys' support staff as attorneys and withdraw their request for sanctions against the support staff.

Respectfully submitted this December 12, 2017.

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COUNSEL FOR PLAINTIFFS

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### CERTIFICATE OF SERVICE

I certify that on December 12, 2017, a copy of Plaintiffs' Motion to Withdraw and Substitute Counsel was electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following attorney in charge for defendants, Mike Rawlings, et al.

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